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Attorneys for Defendant Jerry Plante

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

MARK WILSON,

Plaintiff,

v.

JERRY PLANTE, and JOHN DOES 1-10,

Defendants.

Case No. 6:21-cv-01606-SI

SHANNON VINCENT'S DECLARATION IN SUPPORT OF DEFENDANT JERRY PLANTE'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER

I, Shannon Vincent, hereby declare:

- 1. I am one of the attorneys of record for Defendant Jerry Plante in this matter and make this declaration from personal knowledge.
- 2. A true and correct copy of an email that I received from plaintiff's counsel in this matter (excluding attachments) on Monday, November 22, 2021, at 4:44 p.m. is attached to this declaration as Exhibit 1.

Page 1 - DECLARATION OF SHANNON VINCENT

SMV/jm8/Wilson 1606 PLD Vincent Declaration iso Def's response to TRO.docx

Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (503) 947-4700 / Fax: (503) 947-4791 3. The November 22, 2021, email was my first notice that plaintiff had filed his complaint in this case on November 4, 2021, and the first I had heard from plaintiff's counsel since communicating with him about this matter on September 29, 2021, as set forth in the concurrently filed declaration of Matthew J. Lysne.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on November 23, 2021.

s/Shannon Vincent SHANNON VINCENT

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Vincent Shannon M

From: Juan Chavez <jchavez@ojrc.info>
Sent: Monday, November 22, 2021 4:44 PM

To: Vincent Shannon M

Cc: Franz Bruggemeier; Jonny Gersten

Subject: Wilson v. Plante, et. al.: Complaint/Temporary Restraining Order

Attachments: 1 Complaint.pdf; 3 TRO.pdf; 7 TRO McKinney Dec.pdf; 8 TRO Manning Dec.pdf; 9 TRO

Gray Dec.pdf

CAUTION EXTERNAL EMAIL This email originated from outside of DOJ. Treat attachments and links with caution. *CAUTION EXTERNAL EMAIL*

Hi Shannon,

Hope you've been well. We filed the above case earlier in the month, and just filed our Motion for Temporary Restraining Order. If you are willing to accept service, Judge Simon says that we can have a hearing on the TRO Wednesday morning at either 9:00 am or 10:00 am. (Tried attaching everything to this email, but met the file size limit. I'll send a follow up with more declarations.)

Best, Juan

--

Juan C. Chavez

Pronouns: he/him/his

Oregon Justice Resource Center

PO Box 5248

Portland OR 97208

Tel: 503-944-2270 ext. 212

Fax: 971-275-1839

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CERTIFICATE OF SERVICE

I certify that on November <u>29</u>, 2021, I served the foregoing SHANNON VINCENT'S DECLARATION IN SUPPORT OF DEFENDANT JERRY PLANTE'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER upon the parties hereto by the method indicated below, and addressed to the following:

Juan C. Chavez

Franz H. Bruggemeier

Oregon Justice Resource Center

PO Box 5248

Portland, OR 97208

Attorneys for Plaintiff

MAIL DELIVERY

OVERNIGHT MAIL

TELECOPY (FAX)

X E-MAIL

X E-SERVE

s/ Shannon M. Vincent

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